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March 5, 2025

VIA ECF

The Honorable George B. Daniels, United States District Judge United States District Court, Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007

The Honorable Sarah Netburn, United States Magistrate Judge United States District Court, Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

> Re: In re Terrorist Attacks on September 11, 2001, Case No. 03 MDL 1570 (GBD)(SN) Accardi et al v. Islamic Republic of Iran, Case No. 21-cv-06247 Alexander et al v. Islamic Republic of Iran, Case No. 21-cv-03505 Betso et al v. Islamic Republic of Iran, Case No. 21-cv-01394

Request for a 14-Day Extension of the Deadline to File Written Objections to the Report and Recommendation, dated Feb. 28, 2025, ECF No. 10755

Dear Judge Daniels and Judge Netburn:

The undersigned, as the attorney for the Plaintiffs in the above-referenced actions, respectfully submits this Letter Motion to request a 14-day extension of the deadline to submit objections to a limited part of the Report and Recommendation issued by the Court on February 28, 2025, ECF No. 10755 ("R. & R."); specifically, that part of the R. & R. which recommended denying the claims for solatium damages brought by 200 Surviving Family Members of Latent Injury Decedents.

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Page 2 of 2

The R. & R. having been issued on February 28, 2025, the current deadline to file written objections is Friday, March 14, 2025. Given that the adoption of this part of the R. & R. would, in effect, result in the dismissal of these 200 individual solution claims, it is respectfully requested that the deadline to submit objections be extended by 14 days to March 28, 2025, to properly and fully brief this matter.

Thank you for the Court's consideration of the above request.

Respectfully submitted,

Nicholas Papain, Esq.

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COUNSEL FOR PLAINTIFFS

IN THE ACCARDI, ALEXANDER,

AND BETSO ACTIONS